

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

JOHN COREY FRASER, ET AL.,

Plaintiffs

v.

**BUREAU OF ALCOHOL,
TOBACCO, FIREARMS
AND EXPLOSIVES, ET AL.,**

Defendants

Case No. 3:22-cv-00410

PLAINTIFFS' MOTION FOR DECLARATORY JUDGMENT AND INJUNCTION

NOW COME, the Plaintiffs, Mr. John “Corey” Fraser, Mr. Joshua Clay McCoy, Mr. Tyler Dalton McGrath, and Mr. Ian Fletcher Shackley,¹ by and through counsel (collectively “Plaintiffs”), and on behalf of themselves and a Class of those similarly situated, respectfully move for this honorable Court to issue a Declaratory Judgment and Injunction. In accordance with the Court’s Local Rules, this motion is accompanied by a memorandum in support of the motion and citations of the authorities on which Plaintiffs rely.

Respectfully submitted,

_____/s_____
Elliott M. Harding (VSB No. 90442)
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Class*
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¹ This motion is also brought on behalf of Mr. Justin Timothy Fraser, who has a pending motion to be added or granted leave to intervene as a party to the suit. His proposed complaint contains the same legal challenges to the same laws at issue and is brought on behalf of himself and the same proposed Class.

CERTIFICATE OF SERVICE

On May 22, 2023, I electronically submitted the foregoing document with the clerk of court for the United States District Court for the Eastern District of Virginia using the electronic case filing system of the court. I hereby certify that I have served all counsel of record electronically as well.

Respectfully submitted,

_____/s_____
Elliott M. Harding (VSB No. 90442)
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